

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

Regina Williams 86529 )  
(full name) (Register No.) )

19-6018-CV-SJ-GAF-P

Plaintiff(s).

Case No. \_\_\_\_\_

v.

CORIZON

TOM Bredeman D.O. Ass. Reg. Medical Director

Stormy Moeller R.N. division  
(Full name) Genny Meehan R.N. director

Defendants are sued in their (check one):

\_\_\_\_ Individual Capacity

\_\_\_\_ Official Capacity

☒ Both

Karen Epperson M.D. CCC Doctor

Valicia Kirby - Nurse practitioner  
Defendant(s). CCC

COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): Chillicothe Correctional Center 3151 LITTON Chillicothe, MO 64601

II. Parties to this civil action:

Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff Regina Williams Register No. 86529  
Address Chillicothe Correctional Center  
3151 LITTON Chillicothe, MO 64601

B. Defendant All Defendants Are Employed by  
CORIZON  
Is employed as \_\_\_\_\_

Paper Behind (next page)

For additional plaintiffs or defendants, provide above information in same format on a separate page.

THOMAS K Bredeman D.O ASS. Regional  
Medical  
Director  
for CORIZON

Stormy moeller R.N. division  
Jenny Meehan R.N. Director over Chillicothe  
Correctional Center  
for CORIZON.

Karen Epperson M.D. Chronic care provider  
At Chillicothe Correctional  
Center medical

Valicia Kirby - Nurse Practitioner for Chillicothe  
Correctional Center employed  
by CORIZON

III. Do your claims involve medical treatment? Yes X No       

IV. Do you request a jury trial? Yes        No X

V. Do you request money damages? Yes X No       

State the amount claimed? \$1,500,000.00 / 500,000.00 (actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes X No       

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

Yes X No       

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes X No       

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

CCC-18-420 5.20.18 IRR was started 9.23.2018 ended CORIZON said  
CCC-18-397 5.14.18 IRR was started 7.23.2018 ended CORIZON said  
inadequate medical care - Retaliation Not supported Not Support

D. If you have not filed a grievance, state the reasons.

HAVE filed NUMEROUS grievance that are not yet done But due to the imminant danger of my spinal nerves from the untreated disease I have, I'm in so much pain And can't function in the wheelchair my diagnosis if untreated could lead to me never walking again

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes        No X

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes        No X

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: NA  
(Plaintiff) (Defendant)

(2) Date filed:

- (3) Court where filed: NA
- (4) Case Number and citation: NA
- (5) Basic claim made: NA
- (6) Date of disposition: NA
- (7) Disposition: NA  
(Pending) (on appeal) (resolved)
- (8) If resolved, state whether for: NA  
(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

next page

- B. State briefly your legal theory or cite appropriate authority:

next page

## General Review

7.5.2017 to Present I HAVE BEEN IN Pain, Debilitating pain from my Lower Back affecting my spine Affecting my sciatic Nerve. IT has progressed to the point of being in a wheel chair unable to perform basic human needs without pain and assistance. Walking and standing has become unbearable.

My diagnosis is <sup>multilevel neuro</sup> ~~formal~~ Anular Stenosis, Annular Bulging Disc <sup>2mm 3mm</sup> x2 Radiculopathy/Neuropathy. <sup>Cervical</sup>

All in my Lumbar Spine along with my Sacral and coxas undetermined Because CORIZON will NOT authorize Any further tests or treatments. I HAVE BEEN sitting IN A Wheelchair since 10.19.17 unable to walk like A Normal Human Being. My quality of life has diminished to the point of Mental Suffering. I HAVE gained 60 lbs to date from depression and ungodly amounts of Steroids along with now I AM BACK ON mental Health medication and seeing a psychiatrist.

The pain with every mechanical movement of my lower spine (legs, arm, feet head, neck all shoot to your lower spine. leaves constant pain with every movement. <sup>although</sup> The

Sciatic

nerve pain is controlled with medication The entire reason for this civil suit is that I AM Being Sat IN A wheel chair And Being refused access to A qualified Specialist ~~in case~~ in My case a neurology consultation.

A provider at CCC NP LA Blance has requested XRAY, CT scan, MRI, and 2 different times A neurology visit. All of these have been Denied By CORIZON / T Bredeman, S Moeller. The last denial of treatment was 4.16.18 That was to see A Neurologist. Since this date I have received NO medical treatment except medication AND a wheel chair. I want to walk I could walk AND not be going thru any of this if CORIZON would just let me see A Specialist. I have been incarcerated here at DOC 13 years I AM going home IN 15 months I need to be worried about adjusting to society not being robbed of a normal life. I should not have to be confined to a wheel chair this is cruel and unusual punishment. Every foot step, every movement your lower body ~~backs~~ makes causes a electric shock of pain with every day life, A shower standing in one place is the most excruciating thing I go thru daily A shower. This has significantly changed my whole quality of life along with the serious cumulative effect from these repeated denials of care the mental depression weight gain the pain AND hopelessness. CORIZON'S Rigid list of reason why they wont help me "NO cord compression" That MRI was done 9/3/18. Since then nothing

Almost ONE year later Repeated Acts have accrued numerous requests for help From Sick Calls From IRR's From phone calls From family to family Calling CORIZON All to NO Avail. I NOW HAVE NO feeling in my feet legs When I TRY to Walk I fall I Am in So much pain I Am Mental and physically worn out. I Do NOT Deserve this NO Human Being does. This is why I Am Requesting A injunction to force CORIZON to Send me to A neurologist. The imineint danger of paralysis is looming over me. The excessive Risk of my health AND safety by falling and by disabling<sup>PA</sup> I deserve to have a Regular prison life. CORIZON TBredeman Smoellar K Epperson Valicia Kirby All meant to deny me necessary medical care. I have A Right to walk depriving me of Seeing a neurologist to investigate the "Cause" of my condition causing my Serious pain; Paralysis. is deliberate indifference to my serious medical needs

#### STATEMENTS OF facts

- 7-5-17 Sick Call Back pain
- 7-18-17 Saw DR. SchAAF percribed predizon pack
- 7-26-17 Sick call (pain) NEVER received percribed prediza
- 8-28-17 Sick call
- 9-05-17 Sick call
- 9-22-17 Sick call
- 9-27-17 provider NP T LaBlance Steriad Shot

} so much pain  
mother ends up calling



10.2.2017 X-Ray Done

10.9.2017 X Ray Discussed by <sup>Provider</sup> La Blance / Radiologist

(DEF #1) Requested Cat scan for further testing  
CORIZON Denied

Cat Scan 10.19.2017

(Def #3) SMOeller Denied Cat Scan Requested by  
on site provider also Requested by Radiologist  
that read X-Rays.

11.2.17

11.6.17

11.9.17

11.20.17

11.27.17

12.15.17

Back pain crying for  
help given shots of steroids  
flexril mom has called.  
urinating on myself

12.18.17 Seen DR. Rhodes she put in a Request for  
me to be evaluated by chronic care pain

Def #4 12.21.17 Denied me for chronic care even  
though I am already chronic care for  
tachycardia for my heart. which pain  
directly affects your pulse. Denied <sup>Any</sup> tests

1.4.2018 Mother calls Im in pain

Def #5 1.19.2018 Nurse practitioner Kirby tells me basically  
Im lazy and fat and nothing is  
wrong with me says Im exaggerating  
my walk to work past the pain Says  
my Back issue is resolved

Def #5 1.24.2018 I was Back in self Declare in so much  
pain and nerve pain that I couldn't  
stand it. NP Kirby is Rude Hatful and  
Condesending in her reports she lies  
and falsify's her finding States things  
like grimacing Before touching States  
situation without giving total lies



I have not been able to do Any mechanical movements without grimacing in month. Refused further xRays, Diagnostics says nothing is wrong with me.

1.31.18 Sick call Back pain

2.2.18 provider Another prediZone Pack

Def (#5)  
Kirby

2.13.18 Back pain Sick call Kirby intervenes

3.07.18 provider LaBlance due to vaginal Rectal numbing mri (Lumbar only) <sup>no sacral (OR coccy)</sup> XRAY Repeated Lumbar only

3.8.18 Sick call

Def (#5)  
Kirby

3.13.18 Self Declared Kirby comes in telling me I'm faking I'm over reacting I not in as much pain as I'm saying. Does Nothing tells me to lose weigh

3.18.18 Sick call Back pain elevated Vital

Def (#5)

3.19.18 mother called <sup>heavend again lying on her</sup> notes taking Away the seriousness

~~Def (#5)~~

3.23.18 neurology Consultation Requested By provider np LaBlance due to <sup>LA B normal</sup> negative findings on lumbar spine mri. Wheelchair. ultram

Def #1  
Corizon

3.23.18

Def #2

T Bredeman

Denied neurology consultation even though I'm in emence pain Sent to physical therapy

4.4.18 Mother called

4.5.18 Sick call pain urinating on my self

4.14.18 Self Declare gut wrenching pain The Siactic nerve is pounding.

4.24.18 Sick Call Back pain so Bad Vitalis is Distress So much pain

Def #1 Corizon

Def #2 Bredeman

4.16.18

Ref Sub mission of Neurologist Denied

DEF 1

4.16.2018

DEF 2

Denied Neurology per medical Director  
CORIZON The medical necessity for neurology is  
TBredeman not met. chronic lumbago with sciatica.

NO current neuromuscular examination  
indicating progressive or worsening  
myelopathy. Inmate did not tolerate  
physical therapy or participate in pt  
MRI reveals DJD / Formaminal stenosis  
no cord compression. Recommend  
treating Inmate pain Objectively  
rather than Subjectively with  
Appropriate non-narcotic medication  
and once pain is controlled re-  
initiating pt.

4.12.18 I did try to do physical therapy I  
was feet shackled and arm shackled  
and driven to the hospital plus coughing  
a squating 3 times I can barely  
move but was made to do this  
before I got to the hospital.  
I did what I could the person  
doing it stopped it because of my  
vitals and nausea she reports  
that she recommends specialists  
also. 75% Disabled.

AFTER this transport and put in a car  
instead of a wheel chair acc. van. The strip  
search the shaking the physical therapy  
the nerves are impinged from the swelling  
on my spine I'm peeing on myself I  
cant feel my legs the nerve pain the constant  
gut wrenching pain. I nervously attempt help.

4.24.18 Sick Call Back pain NO ONE Will help Me.

5.2.18 I'm seeing a provider LA Blance But She tells me there is nothing else corizon wont allow anything tells me she has been instructed to Deal with me Objectively not Subjectively I asked what that meant. She said it meant to take Away the person Deal with the problem. La Blance DID give me ultram for the pain it does not help the nerve (siatica) the pulsing pounding But it does help the mechanical movement pains. Vitals off the chain

Insert  
MAY  
15  
↓

Def (1)  
Def (2) 5.18.18 T Bredeleman Retaliated for filing IRR took AWAY ultram (pain medication) saying Because I was on Gabapentin They Are for 2 different things ONE The Gabapentin is for a nerve Blocker. The ultram was for the pain in movements. I didn't take the ultram All the time only when I really needed it.

5.15.18 told that Gabapentin would be raised to 400mg.

5.16.18 filed A IRR ON Denying all my test And Neurologist.

5.17.18 Called by Mrs. Corbin she told me she talked to T. Bredeleman he SAID NO Neurologist.

Def (1)  
Def (2) 5.18.18 Retaliated And discontinued My tramadol States T Bredeleman Tramadol must be discontinued if Gabapentin is started. I have been on Both Since 4.14.18 App. By T Bredeleman

apentin AND Tramadol is contraindicated because of the potential for abuse, And reinforcement of drug seeking behavior. please note. he App. Both Since 4.14.18 Also I used it only when neccarry.

5.20.18 Self Declare Pain so Bad

5.21.18 physical therapy in TCU had to refuse I had A Biopsy on my uterus today plus no pain medication can't Do physical therapy

Unfortunately I have been waiting for my medical Records Since 1.10.18 from 5.21.18 to present I paid for them but have not recieved them. I Am in so much pain I can't think straight Anymore I have got to get this filed to see A neurosurgeon I'm hoping I Am doing this right on the imenient danger to see A specialist.

## My legal theory

The U.S. Constitution Requires prison officials to provide All State prisoners Adequate medical care *Estelle v. Gamble*, 429 U.S. 97, 103, 975 Ct. 285, 290, 50 L. Ed. 2d. 251 (1976). (42 U.S.C. § 1983) is proper Venue while Requesting relief. CORIZON is missouri Department of corrections Health Care provider. CORIZON is Defendant # 1 in the official Capacity Tom Bredeman is the Regional Medical Director And is Defendant # 2 and is being named in the "official" and "individual" Capacity. S Moeller is A RN Employed By CORIZON is Being named as Defendant # 3 in the "official" and the "individual" Capacity. DR. Epperson is the Chronic care Doctor At Chillicothe Correction Center And is being named in the "official" Capacity and the "individual" Capacity. ALSO Employed By CORIZON Valicia Kirby Nurse practitioner is being named in the "official" and "individual" Capacity in Violating my civil Rights. The Cumulative effects of these 5 defendants in the name of CORIZON HAVE intentionally delayed Medical treatment since 7-5-17 to present. My Eighth Amendment Right to be free from cruel and unusual punishment and the 'unnecessary AND wanton infliction of pain. Applying the Deliberate indifference Standard failing to investigate enough to make A informed judgement *Tillery v. Owens*.



719 F. Supp. 1256 1308 (W.D. Pa. 1989) aff'd, 907 F.2d. 418 (3<sup>rd</sup> Cir 1990) CORIZON As to Date has allowed me to suffer in pain sitting me in a wheelchair gaining 60 lbs mental depression degenerating my ~~po~~ Back at a faster rate with little movement. CORIZON Defendant 1 thru 5 did not properly treat me, did not investigate the cause of my medical condition, Liscio v. Warren 901 F.2d 274, 276-77 (Cir 1990) did not order diagnostic tests. (tried to order some <sup>(1)</sup> But was denied) Perez v. Anderson, 350 F. App'x 959, 961 (5<sup>th</sup> Cir. 2009.) did not send me to a specialist (was attempted 2x defendants 1, 2, 3<sup>rd</sup> denied) Green v. Daley 414 F.3d 645, 655 (7<sup>th</sup> Cir 2005) also the intentional delay Tyler v. Smith 458 F. App'x 597, 598 (9<sup>th</sup> Cir 2011) also see McElligott v. Foley 182 F.3d 1248 1256-57 (11<sup>th</sup> Cir 1999) findings that repeated delays constant pain lack of diagnostic tests Murphy v. Walker 51 F.3d 714 719 (7<sup>th</sup> Cir 1995) In the Statements of facts CORIZON and the 5 other defendants were very much aware of my repeated attempts to get medical attention to receive proper and adequate medical attention. Even a lay person can see my medical needs the chronic and substantial pain Brock v Wright 315 F.3d 158, 162 (2<sup>nd</sup> Cir 2003) define a serious medical need as a "condition of urgency one that may produce death, degeneration or extreme pain. All of 5 Defendants ignored my obvious diagnosed condition and left me in continual turmoil Shepherd v. Powers NO 11 Civ. 6860 (LT) (R.S.) 2012 WL 4477241, At \*6 (S.D.N.Y. Sept 27, 2012.)

Hudson v. McHugh, Sanderfer v. Nichols, Reeves v. Collins all show that Delaying interfering with medical orders that a provider requested, The physical therapist At Cameron Hospital The Radiologist Reading the x-rays. All were denied by Defendant 1# 2# 3# Gil v Reed, 535 F.3d 551.557 (7th Cir 2008) NOW Almost 1 year from the last XRAY OR MRI Nothing has been done on Any treatment except for my home exercise plan that <sup>I do</sup> Cameron gave me almost 1 year ago. I walk at the most 3-4 min. I can not stand in one place more than 8 min. my feet are numb legs numb I fell due to legs not working urinating on 12.20.18 I was Refused Any new tests say not needed Refused Neurology Defendant #4 says NO further treatment needed. I am in constant pain and I am afraid of The Damage that <sup>these</sup> nerves could be hurt for life. I Am in iminent Danger of serious physical harm. I am Requesting The Courts for A injuction Requesting A neurology consult And Any tests And procedures Requested Brown v. Johnson, 387 F.3d 1344, 1350 (11th Cir 2004) Jenny Meehan DEF #3 in the official Capacity and in the individual Capacity, in the employment of Corizon is a RN But also is and has the position to see A of Grievances She is also the Supervisor over



Medical department thru corizon. When Def #3 sees inconsistency in medical charting and care it is her Duty of Care to Me to address the situation and not to turn her head. I Grievance Response ccc 18-842 The information was provided to her and she wrote it down but did nothing continually allowing my medical needs to go unresolved also seeing that provider DR. Epperson ~~was~~ on 12-24-18 completely lied on my medical Records stating I was observed in no obvious distress no disability noted (Im in a wheelchair) I walked sat and stood normal.

All is completely lies. Condoneing these lies allows my medical needs to be continually denied. Allowing me to have a cumulative affect of serious pain non stop since 7-15-17 until present my quality of life has diminished to the point of hopelessness. mental suffering Im so afraid of perment spinal injury that's what happens when you put it in the internet it says if untreated perment injury. I do not deserve to be put in a wheelchair and go untreated. let me reiterate due to my persistence they see me but they do nothing to resolve this condition Not allowing me to see a specialist and have current imaging on a progressive

Disease especially on my spine that  
is essential to the Bodies entire  
movement *Rgnilleris*

X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.  
Injunction to let me see neurologist cat scan of my entire spine. Compensation for the pain and suffering and money spent.

XI. Counsel:

Actual / Punitive Damages

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. NA

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes X No     

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted. enclosed letter  
Thomas R Bellman 311 W. Kansas Independence mo  
Hiedman 111 W. Broadway Bolivar mo 64650  
John Kurtz 814 241 2287

C. Have you previously had a lawyer representing you in a civil action in this court? Yes      No X

If your answer is "Yes," state the name and address of the lawyer.  
NA

**I declare under penalty of perjury that the foregoing is true and correct.**

Executed (signed) this 30 day of January 2019.

B. Williams 86529  
Signature(s) of Plaintiff(s)

Prisoner # 80529 74

3151 letter  
Chillicothe Mo letter

RECEIVED

2019 FEB 12 PM 12:43

COURT  
WEST DIST OF MO.  
KANSAS CITY MO.

✓ 39a1

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U.S. District Court

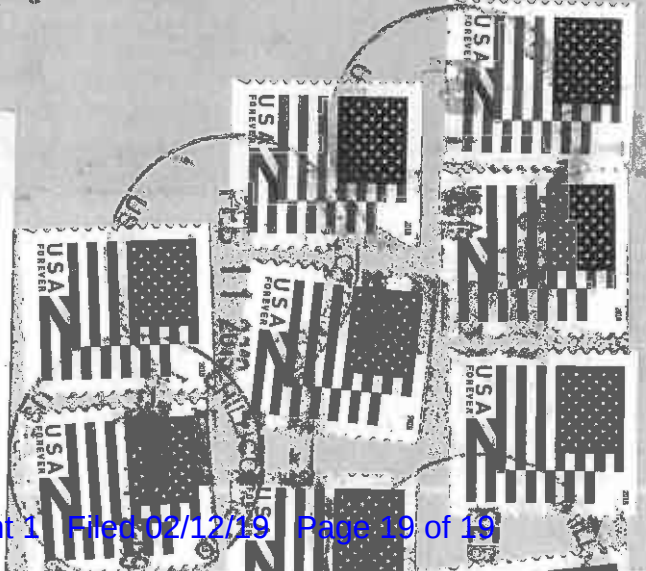
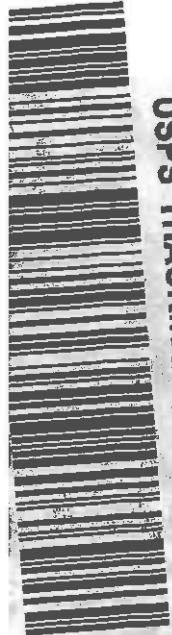
Office of the Clerk

1510 Whittaker Court House

400 E. Ninth Street

Kennett 64106

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